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Attorneys for Defendants
GEICO General Insurance Company
and Leigh Aubuchon

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CRAIG ZUCHELKOWSKI,

Plaintiff,

v.

Case No. 2:20-cv-02182-GMN-EJY

GEICO GENERAL INSURANCE
COMPANY, a Foreign Corporation; LEIGH
AUBUCHON, an individual; DOES I through
XX, inclusive; and ROE BUSINESS
ENTITIES I through XX, inclusive,

Defendants.

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINE
DATES (SECOND REQUEST)**

The Parties to this matter, by and through their respective Counsel of Record, hereby submit this stipulation and proposed order specifically seeking to extend the discovery deadline and dates related thereto by 90 days.

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1 IT IS HEREBY STIPULATED AND AGREED between the parties to extend the discovery
 2 deadline of December 29, 2021; the initial expert deadline of October 29, 2021; the rebuttal expert
 3 deadline of November 29, 2021; the dispositive motions deadline of January 28, 2022; and the joint
 4 pre-trial order deadline of February 28, 2022. In accordance with Local Rule 26-3, the parties state
 5 as follows:

6 **I. DISCOVERY COMPLETED BY THE PARTIES:**

7 The parties have served their initial disclosures as well as several supplements thereto. The
 8 parties have propounded and responded to one another's respective written discovery. Plaintiff's
 9 deposition took place on October 11, 2021.

10 **II. DISCOVERY WHICH REMAINS TO BE COMPLETED:**

11 Plaintiff intends to depose the relevant claims handling personnel at GEICO, all of whom
 12 reside out of state.

13 The parties will also seek to disclose and depose experts.

14 **III. REASONS WHY DISCOVERY WAS NOT SATISFIED OR COMPLETED WITHIN**
 15 **THE TIME LIMIT SET BY THE DISCOVERY PLAN:**

16 The parties have been working diligently throughout the discovery process. As indicated
 17 above, the parties engaged in substantive discovery efforts in terms of disclosures and written
 18 discovery, and the recent deposition of Plaintiff. However, Plaintiff's deposition just occurred on
 19 October 11, 2021, and the parties require additional time to obtain and disclose experts, and conduct
 20 additional depositions.

21 **IV. GOOD CAUSE EXISTS TO GRANT THE REQUESTED EXTENSION**

22 The instant stipulation is submitted within the timeframe outlined by LR 26-3, as it is
 23 submitted within 21 days before the expiration of the October 29, 2021 deadline for initial experts.
 24 As stated above, the parties have been working diligently on all discovery-related items but the
 25 recent production of written discovery responses and executed authorizations make a 90-day
 26 extension necessary. The parties anticipate this extension will be a reasonable amount of time for
 27 all depositions and disclosures mentioned above to take place.

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1 **V. SCHEDULE FOR COMPLETION OF ALL REMAINING DISCOVERY:**

2 The parties request that the pertinent discovery deadlines set forth in the Court's Scheduling
3 Order be continued ninety (90) days, as follows:

4 A. ESTIMATE OF TIME REQUIRED FOR DISCOVERY: Pursuant to Local Rule 26-
5 1(b)(1), and with the Court's approval, discovery shall be completed on or before March 29, 2022.

6 B. EXPERT DISCLOSURES: Unless otherwise stated herein, and the Court so orders,
7 the date for the parties to exchange initial expert witness disclosures shall be sixty (60) days prior
8 to the discovery cut-off date, but not later than January 28, 2022, and rebuttal expert disclosures
9 shall be thirty (30) days prior to the discovery cut-off date, but not later than March 1, 2022.

10 C. DISPOSITIVE MOTIONS: Unless otherwise stated herein, and the Court so orders,
11 the date for filing dispositive motions shall be thirty (30) days after the discovery cut-off date, but
12 not later than April 28, 2022.

13 D. PRETRIAL ORDER: Unless otherwise stated herein, and the Court so orders, the
14 joint pretrial order shall be filed thirty (30) days after the date set for filing dispositive motions, but
15 not later than May 30, 2022.

16 DATED this 19th day of October, 2021

17
18 PAUL PADDA LAW, PLLC

19 By /s/ Srilata R. Shah

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26 Attorneys for Plaintiff
27
28

1 DATED this 19th day of October, 2021

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3 WAYTE & CARRUTH LLP

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7 Attorneys for Defendants

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9 **IT IS SO ORDERED.**

10 DATED this 19 day of October, 2021

11 
12 UNITED STATES MAGISTRATE JUDGE

13 032193-000198 7970639.1